

1
2
3
4
5
6
7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 STEVE TEIXEIRA,

11 Plaintiff,

12 v.
13 MOZILLA CORPORATION a.k.a. M.F.
14 Technologies, a California corporation;
15 MOZILLA FOUNDATION, a California public
16 benefit corporation; LAURA CHAMBERS and
17 her marital community; WINIFRED
18 MITCHELL BAKER and her marital
19 community, and DANI CHEHAK and her
20 marital community.

21 Defendants.

22 Case No. _____

23 **DECLARATION OF MATTHEW
24 BECKER IN SUPPORT OF
25 REMOVAL OF ACTION TO
26 FEDERAL COURT**

27 I, Matthew Becker, declare as follows:

28 1. I am employed by MZ Denmark GmbH, Mozilla Corporation's ("Mozilla")
29 German subsidiary, as the Senior Director of Global Accounting and Controlling. I am based
30 in Berlin, Germany. I make this declaration to support the Notice of Removal filed by Mozilla
31 in the matter of *Steve Teixeira v. Mozilla Corporation, et al.* I have personal knowledge of the
32 matters set forth herein, and if called as a witness, I could and would testify competently
33 thereto.

34 2. Mozilla is a California corporation with its principal place of business in San
35 Francisco, California.

36 3. Mozilla is a wholly owned subsidiary of Mozilla Foundation.

37 4. In my role with Mozilla, I have access to employment data, including, but not
38 limited to, payroll data. These files are made and kept in Mozilla's ordinary course of business.

1 5. Plaintiff Steve Teixeira is currently employed with Mozilla as the Chief Product
2 Officer, earning a base salary of \$500,000, an annual bonus target of 40% of his base salary,
3 and a 2023 long term incentive plan award target of \$3,250,000.00.

4 I declare under penalty of perjury under the laws of the United States of America and
5 the State of Washington that the foregoing is true and correct.

6 Executed on July 11, 2024 at Berlin, Germany.

Mittel Bau
Matthew Becker

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

1
2
3
CERTIFICATE OF SERVICE
4
5
6
7

I hereby certify that on July 11, 2024, I caused a true and correct copy of the foregoing document to be served on the parties listed below in the manner indicated:

Mathew L. Harrington Amy K. Alexander STOKES LAWRENCE, P.S. 1420 5 th Avenue, 30 th Floor Seattle, WA 98101 E-mail: mat.harrington@stokeslaw.com amy.alexander@stokeslaw.com <i>Attorneys for Plaintiff Steve Teixeira</i>	<input type="checkbox"/> Via Hand Delivery <input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via E-mail <input type="checkbox"/> Via the Court's E-Service Device
Darren Feider, WSBA No. 22430 SEBRIS BUSTO JAMES P.S. 15375 SE 30th Pl., Suite 310 Bellevue, Washington 98007 T: 425 454-4233 F: 425 453-9005 E-mail: dfeider@sbj.law <i>Attorneys for Defendant Mozilla Foundation</i>	<input type="checkbox"/> Via Hand Delivery <input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via E-mail <input type="checkbox"/> Via the Court's E-Service Device

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Dated this 11th day of July, 2024

s/ Jacey Bittle
 Jacey Bittle, Legal Administrative Assistant